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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**DIAMOND RESORTS INTERNATIONAL,
INC., a Delaware corporation, *et al.*,**

Plaintiffs,

vs.

**REED HEIN & ASSOCIATES, LLC d/b/a
TIMESHARE EXIT TEAM, a Washington
limited liability company; *et al.*,
Defendants.**

CASE NO: 2:17-cv-3007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINES TO RESPOND TO
MOTIONS TO DISMISS**

(FIRST REQUEST)

1 Pursuant to Local Rules 6-1 and 6-2, Plaintiffs, DIAMOND RESORTS INTERNATIONAL,
2 INC.; DIAMOND RESORTS CORPORATION; DIAMOND RESORTS U.S. COLLECTION
3 DEVELOPMENT, LLC; and DIAMOND RESORTS MANAGEMENT, INC. (collectively,
4 “Diamond”), and Defendants REED HEIN & ASSOCIATES, LLC d/b/a TIMESHARE EXIT
5 TEAM; BRANDON REED; TREVOR HEIN; THOMAS PARENTEAU (collectively, the “TET
6 Defendants”); and HAPPY HOUR MEDIA GROUP, LLC. (“Happy Hour”), by and through their
7 respective attorneys of record, stipulate as follows:
8

9 **STIPULATION**

10 1. On January 4, 2019, Diamond filed its *Amended Complaint for Damages and*
11 *Injunctive Relief* (the “Amended Complaint”). [DE 59].

12 2. On January 29, 2019, Diamond and the TET Defendants submitted a *Stipulation and*
13 *Order to Extend Time to File Answer to Amended Complaint [ECF NO. 49]* [DE 69] that sought
14 extension of the TET Defendants’ deadline to respond to the Amended Complaint until February 19,
15 2019 which the Court granted on January 30, 2019 [DE71].

16 3. On February 4, 2019, Diamond and Happy Hour Submitted a *Stipulation and Order*
17 *to Extend Time to File Answer to Amended Complaint [ECF NO. 59]* [DE 73] that sought extension
18 of Happy Hour’s deadline to respond to the Amended Complaint until February 28, 2019 which the
19 Court granted on February 5, 2019 [DE 75].

20 4. On February 15, 2019, Diamond and the TET Defendants submitted a *Stipulation and*
21 *Order to Extend Time to File a Response to Amended Complaint [ECF NO. 59]* [DE 82] that sought
22 further extension of the TET Defendants’ deadline to respond to the Amended Complaint until
23 February 28, 2019 which the Court granted on February 20, 2019 [DE 83].

24 5. The TET Defendants filed *Defendants’ Motion for Partial Dismissal of Amended*
25 *Complaint* dated February 28, 2019 [DE 87] (the “TET Motion”).
26
27
28

6. Happy Hour filed the *Happy Hour Media Group, LLC's Motion to Dismiss Plaintiffs' Amended Complaint* dated February 28, 2019 [DE 88] (the "Happy Hour Motion").

7. Diamond's current deadline to respond to both the TET Motion and the Happy Hour Motion is March 14, 2019.

8. Together, the Happy Hour Motion and the TET Motion raise numerous issues to which Diamond must respond and the Happy Hour Motion incorporates arguments from the TET Motion. The additional time sought by Diamond is needed to fully brief every issue raised by both motions to dismiss.

9. Diamond seeks an extension of time to respond to the TET Motion and the Happy Hour Motion from March 14, 2019 to March 25, 2019.

10. This is Diamond's first request for an extension to respond to both the TET Motion and the Happy Hour Motion.

11. Undersigned counsel for Diamond conferred with counsel for the TET Defendants and Happy Hour who do not oppose the instant request.

12. The extension is not made for the purposes of delay.

13. Therefore, the parties agreed that Diamond's deadline to respond to both the TET Motion [DE 87] and the Happy Hour Motion [DE 88] is now March 25, 2019.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
Dated: March 8, 2019.

1 DATED: March 8, 2019

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DATED: March 8, 2019

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ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: